

MEDICAL

Page 1 of     

INSPECTION REPORT NO. 79-01

Attached

Paul S. Friedman, M.D.  
1422 Chestnut St.  
Philadelphia, Pa 19102

- Appendix A
- Appendix B
- Appendix C
- Memo

Licensee contact: above Telephone no. 204-2103

License no. 37-00147-02 Last amendment and date: 11 3/21/74

Category: G, and Priority: IV, as of last amendment.

Inspection date(s): 7/3/79 Type of inspection: Routine  
Unannounced

SUMMARY OF FINDINGS AND ACTION

- |   |  |
|---|--|
| <input type="checkbox"/> No noncompliance, clear 591 issued           | <input type="checkbox"/> Noncompliance, 591 issued     |
| <input checked="" type="checkbox"/> Noncompliance, Appendix A         | <input type="checkbox"/> Regional action Hq action     |
| <input type="checkbox"/> Action on previous noncompliance, Appendix B | <input type="checkbox"/> Supplemental info, Appendix C |

RECOMMENDATIONS

See basis in Appendix C or attached memo.

Change Category to:                       Change Priority to:                     

Next inspection date: 7/80 (as soon as renewal of license is completed)

PERSONS CONTACTED

David Bryant Chittick \_\_\_\_\_

Dr. P. S. Friedman, M.D. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Inspector: J. McInness

B/1  
7/16/79

Approved: J. Glenn for R. McChittick

7/18/79

Plan approved: \_\_\_\_\_ Date: \_\_\_\_\_

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

Inspection Items	Scheduled for inspection	Post-inspection status	Module no.	766 Time Info
Management meeting - Entrance and Exit Interviews [REQUIRED]	✓		30703B	1/2 hr.
Initial Management Meeting				
Program requirements, MC 2B [REQUIRED]	✓		78710B	3/4 hr.
Licensee Event Followup			92700B	
Followup on Inspector-identified problems			92701B	
Followup on Noncompliance and Deviations			92702B	
IE Bulletin/Immediate Action Letter Followup			92703B	
Followup on Headquarters Requests			92704B	
Followup on Regional Requests			92705B	
Independent Inspection Effort [REQUIRED]	✓			1/2 hr.
Inspector Dispatched to Site			93700B	
Followup on Significant Event Occurring During Inspection			93701B	

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEMS	CRITERIA	FINDING
1. <u>Organization</u>	Lic Cond	<u>15</u>
Structure of organization as described in requirements?		
NOTES & REMARKS:		
2. <u>Licensee internal audits</u>	Lic Cond	<u>15</u>
Scope and frequency of audits as required? Conducted by appropriate persons? Records maintained? Reviewed by management? Deficiencies identified & corrected?		
NOTES & REMARKS:		
3. <u>Training and qualification of personnel</u>	Lic Cond	<u>N/A</u>
Training & retraining conducted as required? Written & oral exams conducted? Examination results reviewed by management?		
Instructions to workers per 19.12?	19.12	
NOTES & REMARKS:		
4. <u>Radiation protection procedures</u>	Lic Cond	<u>6, 7, 8</u>
Procedures available and implemented? Identify radiopharmaceutical and dose(s)? Cover handling of patients receiving therapeutic doses? Cover handling of cadavers?		
Emergency procedures for spills, etc? Personnel understand procedures?		
NOTES & REMARKS:		

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
-----------------	----------	---------

5. <u>Use of materials</u>	Lic Cond _____	_____
----------------------------	----------------	-------

Procurement and use as required?

Special tests (moly breakthrough, leak tests, etc) required? - *N/A*Dose calibration checks performed? *no dose calibrator*Posting & labeling as required? - *done* 20.203

NOTES &amp; REMARKS:

6. <u>Storage of materials</u>		_____
--------------------------------	--	-------

Material secured in both restricted and unrestricted areas? Adequately?

20.207

NOTES &amp; REMARKS:

*isotopes stored in appropriate lab w/ CTA labels  
office locked after hours*

7. <u>Facilities</u>	Lic Cond <u>    </u>	_____
----------------------	----------------------	-------

As described in lic cond or application?

Any changes made? Adequacy?

NOTES &amp; REMARKS:

8. <u>Instruments</u>	Lic Cond <u>15</u>	<u>1/C</u>
-----------------------	--------------------	------------

Survey meters &amp; instruments adequate for program?

Instruments & meters operable? Calibrated?  
Calibration adequate?

NOTES &amp; REMARKS:

*survey meter present - no batteries  
in it - not were any calibrations completed  
for several years*

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEMS	CRITERIA	FINDING
------------------	----------	---------

9. Receipt and transfer of material

Written procedures for pickup, receiving, opening packages?	20.205	N/C
Survey of packages when received?	20.205(c)(1)	
Records of survey of packages?	20.401(b)	
Transfer of materials proper? Transfer records maintained?	30.41, 30.51	
Authorized containers used? Shipping papers & package labels proper for packages on hand?	71.5	

## NOTES &amp; REMARKS:

packages of isotopes were delivered to Dr. Friedman home - he then brought them to the office.

10. Personnel protection - external

Personnel monitoring controls adequate? Exposures minimized?	20.101 20.202	deviation
Exposure records (NRC-4 or 5) maintained? Available for employee review?	20.102(b), 20.401(a)	
Surveys conducted? Adequate?	20.201	
Records of monitoring, surveys?	20.401	
Levels in unrestricted areas within limits?	20.1, 20.105	

## NOTES &amp; REMARKS:

proper dosimetry not worn during preparation or apt. injection (No TLD rings - Dr. Friedman no dosimetry)

11. Personnel protection - internal

Airborne concentrations in restricted areas?	20.103
Exposures to minors?	20.104
Posting of airborne radioactivity areas?	20.203(d)
Survey, monitoring adequate for airborne radioactivity, surface contamination? Records maintained?	20.201 20.401

## NOTES &amp; REMARKS:

## AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEM	CRITERIA	FINDING
<u>12. Effluent controls, waste disposal</u>		<u>C</u>
Release of effluents controlled?	20.106, 20.303	
Waste disposals controlled?	20.301, 20.303, 20.304, 20.305	
Procedures, records maintained?	20.401, Lic Cond _____	
Surveys made? Adequate?	20.401	
<i>NOTES &amp; REMARKS:</i> <i>stored for decay - monitored w/ GYM + discarded in normal trash.</i>		
<u>13. Notifications and reports</u>		<u>C</u>
To individuals.	19.13	
Overexposures, excessive levels & concentrations, incidents.	20.403, 20.405	
Personnel exposures and monitoring, termination reports.	20.407; 20.408	
Theft or loss of licensed material.	20.402	
<i>NOTES &amp; REMARKS:</i>		
<u>14. Posting of notices</u>		<u>C</u>
Part 20, license & documents, procedures, notice of violations posted?	19.11(a)	
NRC-3 posted?	19.11(c)	
<i>NOTES &amp; REMARKS:</i>		
<u>15. Other license conditions</u>	Lic _____	

AREAS INSPECTED AND FINDINGS

Licensee: \_\_\_\_\_ License no: \_\_\_\_\_ Amendment no: \_\_\_\_\_

INSPECTION ITEMS	CRITERIA	FINDING
------------------	----------	---------

16. Confirmatory measurements

17. Independent inspection effort

Accountability for therapeutic implant services  
 Special Area Considerations  
 Eyes  
 Deterioration  
 .33 Xc procedures

18. Incidents and events

Any incidents of misadministrations, contamination, etc, not otherwise covered by reports?

APPENDIX A - DOCUMENTATION OF NONCOMPLIANCE

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

Reference \_\_\_\_\_ Basis for noncompliance \_\_\_\_\_

Report item \_\_\_\_\_ limits use of licensed material to  
 10 CFR \_\_\_\_\_ 1422 Chestnut St, Phil. Pa. - Dr. Friedman's  
 Lic Cond 10 office. - contrary packages of isotopes were  
 Type n/c infraction delivered to Dr. Friedman's home & later  
 transported to his office for use.

Report item \_\_\_\_\_ - 20.103 - surveys of lab area have not  
 10 CFR 20.201a/b been completed since 4/79.  
 Lic Cond \_\_\_\_\_ - 20.202b - dosimetry not worn by Dr. Friedman  
 Type n/c infraction during injections - Chief tech no. FD using of method  
 of determining exposure to fingertips

Report item \_\_\_\_\_ 20.207b - GM meter was inoperable at  
 10 CFR \_\_\_\_\_ the time of this inspection - no battery  
 Lic Cond \_\_\_\_\_ loaded in it  
 Type n/c \_\_\_\_\_

~~Report item~~ \_\_\_\_\_ = safety practices.  
 10 CFR \_\_\_\_\_ - no dose calibrator  
 Lic Cond \_\_\_\_\_ - no calibration of GM meter  
 Type n/c \_\_\_\_\_ - gloves not worn during syringe preparation  
 - syringe shields not used regularly.  
 - no segregation of rad. area from nonradial  
 area (isotope room being used as a lounge  
 coffee cups, cigarettes, etc.)

Report item \_\_\_\_\_  
 10 CFR \_\_\_\_\_  
 Lic Cond \_\_\_\_\_  
 Type n/c \_\_\_\_\_



APPENDIX B - LICENSEE ACTION ON PREVIOUS INSPECTION FINDINGS

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

Identification and summary of action taken	Status
--	--------

Report no: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken: \_\_\_\_\_  
OPEN  
CLOSED

Report no: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken: \_\_\_\_\_  
OPEN  
CLOSED

Report no: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken: \_\_\_\_\_  
OPEN  
CLOSED

Report no: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken: \_\_\_\_\_  
OPEN  
CLOSED

Report no: \_\_\_\_\_ Type n/c: \_\_\_\_\_ Describe: \_\_\_\_\_

Action taken: \_\_\_\_\_  
OPEN  
CLOSED

## APPENDIX C - SUPPLEMENTARY INFO \_\_\_\_\_

Licensee: \_\_\_\_\_

License no: \_\_\_\_\_

- Uncorrected/repeated noncompliance  
 Unusual occurrence, conditions, etc  
 Basis for change of Category or Priority

- Unresolved items  
 Inspector's comments

Dr Paul Freedman's license is presently pending renewal. His old license is quite lax & it was discussed <sup>as to some</sup> procedures that he will probably be held to in the future when licensing responds to him.

Reinspection of his facility after renewal is completed would be advantageous to see if he begins to implement new policies.